

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of

Improving Public Safety Communications in)	
the 800 MHz Band)	WT Docket 02-55
)	
City of Hartford, Connecticut)	TA Reference No. 1125
Licensee of 800 MHz Public Safety Radio)	
Station WPSJ542 serving Hartford, Connecticut)	
and the surrounding area)	

Second Update to Interim Request for Waiver of the
June 26, 2008 Deadline for Completion of 800 MHz Rebanding

The City of Hartford, Connecticut (the “City”), by counsel, and pursuant to Section 1.925 of the Commission’s rules 47 C.F.R. § 1.925, and the Commission’s Public Notice in Docket 02-55, *Federal Communications Commission Provides Guidance for Submission of Requests for Waiver of June 26, 2008 Deadline for Completion of 800 MHz Rebanding*, FCC 08-23, released January 17, 2008, hereby updates its request for waiver of the deadline to complete reconfiguration of its 800 MHz system serving the City and the area surrounding it. This update follows on the first update the City provided on July 18, 2008.¹

When the City first updated its Interim Request for Waiver, it believed that the Frequency Reconfiguration Agreement would have been fully executed by August 15, 2008. Hartford executed the FRA and tendered it to Nextel on August 25, 2008. The

¹ To the extent necessary or appropriate, the City requests that the Commission waive any deadline for the filing of this update and accept it as timely filed – within a week of the date on which the City ultimately entered into an agreement with its vendor for performance of the services necessary to accomplish rebanding. Any earlier filing would have been less precise and subject to continued updates. With the vendor agreement fully executed, the City is able to more accurately forecast its rebanding future.

FRA languished until September 23, 2008, when Nextel finally executed and returned the fully executed document to the City.

The City then learned that its vendor, M/A Com would not complete the reband without a specific rebanding services agreement. The City commenced negotiations with M/A Com in December 2008 and concluded them in April 2009. The M/A Com Rebanding Services Agreement has been fully executed.

The City encountered software issues with the Subscriber Units sent as Replacement Equipment. The City also experienced a greater than average battery failure in the Replacement Equipment. The is working with M/A Com to ensure the Replacement Equipment works in harmony with the City's existing system and to resolve the battery problems.

Each of these complications has delayed the true start of the City's rebanding efforts. Even so, the City is moving forward with its efforts. M/A Com assigned a project manager so that M/A Com's efforts may commence, as well.

With its vendor agreement in hand and a plan for resolution of the software and battery problems, the City believes it will complete reband and be prepared to release the Incumbent Frequencies on or before December 31, 2009.

The foregoing considered, the City asks that the Commission extend its deadline for the completion of reconfiguration until December 31, 2009.

Respectfully submitted,

THE CITY OF HARTFORD, CONNECTICUT

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